

201-15483

Ciba Specialty Chemicals  
Corporation

Richard Balcomb  
Head, Toxicology and  
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Expert Services  
540 White Plains Road  
Tarrytown, New York USA 10591



July 27, 2004

Michael O. Leavitt  
Administrator  
US Environmental Protection Agency  
HPV Challenge

**Subject:** Test Plan and Robust Summaries for IRGANOX 1330 / ETHANOX<sup>®</sup> 330  
1,3,5-trimethyl-2, 4,6-tris (3,5-di-t-butyl-4-hydroxybenzyl) benzene  
CAS No. 1709-70-2

Dear Mr. Leavitt:

Ciba Specialty Chemicals Corporation and Albemarle Corporation support EPA's High Production Volume (HPV) chemical challenge program and its effort to gather and publish basic hazard information on those chemicals manufactured at high volumes in the United States. Ciba Specialty Chemicals Corporation and Albemarle Corporation are co-sponsors for 1,3,5-trimethyl-2, 4,6-tris (3,5-di-t-butyl-4-hydroxybenzyl) benzene and we here submit for review and public comment our available data and test plan.

Sincerely yours,

Richard Balcomb

**HPV Registration Number:**

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